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3 26 Pil '93

Transmittal of Baseline Change Proposal #94-10-RFP

Autar Rampertaap, Branch Chief, Rocky Flats Branch, EM-453, HQ

This memorandum is forwarding Baseline Change Proposal (BCP) #94-10-RFP which addresses the Solar Ponds Project scope, schedule, and cost This change is driven primarily by the dispute resolution effort which was concluded on September 30, 1993. That dispute resolution provided a substantial change in the near-term approach for the Solar Ponds Project. The magnitude of the changes in this proposal exceed the thresholds for Level I Baseline Change Control Board (BCCB) review and approval.

Action on the attached BCP #94-10-RFP is requested by the Level I BCCB Please contact F Lockhart at (303) 966-7846, if you have questions on the package or require additional support for presentation to the Level I BCCB

Richard J Schassburger

Acting Director

Environmental Restoration Division

Attachment

CC

H Belencan, EM-453

J Ciocco, EM-453

D Simonson, OOM, RFO

W Thompson, USBOR

S Keith, EG&G

R Piburn, EG&G

CORRES CONTROL X X PATS/T130G ADMN RECORD/080

Reviewed for Addressee Corres Control RFP

12-2-93 CL

Re' Ltr #

DOE ORDER # <u>5400 |</u> 4700 | **ADMIN RECORD**

3)

RF-46522 (Rev 9/93)

memorandum

DATE

NOV 2 3 1993 !

REPLYTO

ATTN OF

OOM DPS 13237

SUBJECT

Baseline Change Proposal Submittal to DOE Headquarters

TO

Frazer Lockhart, Environmental Restoration Division, Rocky Flats Office James A Ledford, ERM, Solar Pond Project, EG&G Rocky Flats, Inc Ronald B Piburn, CP&B, Project Scheduling, EG&G Rocky Flats, Inc

Reference

BCP #94-10 - RFP, OU-4, Solar Ponds Projects, Scope, Schedule, and Cost Re-Baselining

The Plant Change Control Board endorsed the above referenced Baseline Change Proposal on

November 22, 1993, for submittal to the Level I Baseline Change Control Board (BCCB)

The Level I BCCB (EM-40, DOE/HQs) must review and approve this proposed change prior to site implementation

David P Simonson, Chairman Plant Change Control Board

Attachment

cc w/Att

N Hutchins, EG&G

D Stewart, EG&G

W Franz, EG&G

R Prideaux, EG&G

	EM-40 Baselin	e Change Proposal (BCP)	
1 BCP Tiue		2a Field Office BCP Number 94-10	3 Date initiated November 19, 1993
RFP, OU-4, Solar Ponds So Cost Re-baselining	ope, Schedule, and	25 H Q BCP Number	4 Processing Designation Routine Priority
5 Point of Contact		6 BCP Approval Authority	7 Baseline Type
F R Lockhart, (303) 966-45 S R Kelth, (303) 966-8541	38	Level 0	CostSohedule _X
0 11 110144 (505) 700-0511		Level 2	ScopeX
8 Change Description			
	te the OU4 IM/IRA program (se	e attachment)	
9 Justification for Change			
The old approach prevented accelerate site remediation	early action for site remediation	. This change is necessary to strategically	re-direct the program and
10 Impact of Non-Approva			
DOE would be required to DOE could be assessed IAC milestones	re-negotiate the affected milesto I monetary penaltics relative to	ones which have been approved by the EPA the OU4 Phase I RFI/RI draft and final rep	and CDH. In addition, orts due to missed
11 Impact on Cost Baselin	g 12 Impa	ct on Funding	
Total Cost0	Curre	nt year funding is not affected (see attachm	ent)
TPCS	1.845.774		
13 Impact on Schedule (B	aseline Milestones)		
Impact on schedule is subs	tantial for portions of the progra	m (see attachment)	
14 Impact on Scope (e.g.,			,
Impact on scope is minima to correspond with the new	however, the penod of perion milestones (see attachment)	mance 13 substantial and will require EG&C	3 to rebaseline their program
The proposed accelerated echodule f Phasa I Program, has aliminated the OU 4 Phasa I draft and final RFI rep	or the IMMRA Decision Document, possibility of the EPA and CDH fronts. Acceleration of OU4 IMMRA	or corrective action as appropriate) remediation/closure of the Solar Evaporation Polar imposing IAG monetary penalties associated program by approximately 18 months will result	onds (SFP), and restructuring of the OU4 with the missed IAG milestones for the
16 Field Baseline Change		tion /	^
Approved (Level) Disapproved	al 2 BCP Only)		- 1 Who ha
	el 0 & 1 BCP's Only)	Field BCCB Chain	1/32/95
17. DOE/HQ EM-40 BCCP A	otion (I evel 1)	Field BCCB Chair	person Date
Approved (Leve	*	BCCB Chairper	
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Eligaised (Devi	aru a r deps Only)	EM-1	Data
10 00000 5000 500		(Level 0 BCPs On	Date
18. DOE/HQ ESAAB BCCB Approved	Action (Level 0)		
Disapproved			Maka
		ESAAB BCCB Cha	merson Date

ROCKY FLATS - PLANT CHANGE CONTROL BOARD (PCCB) BASELINE CHANGE PROPOSAL (BCP)

1	Title. Organization	RFP, OU-4 Solar Ponds Project	ts, Scope, Schedule, and C	ost Re-Baselining		94-10 010201/2
	Program Manager M&O Director M&O Lead RFO Lead	N M. Hutchins S R. Keith J A. Ledford F Lockhart N M. Hutchins L D. Ledford F Lockhart N M. Hutchins S R. Keith J A. Ledford F Lockhart N M. Hutchins S R. Keith J A. Ledford	en Med Hutele	Ext 8540 Ext 8541 Ext 8673 Ext 4538	Date Date. Date. Date.	11-10-93
2	Change Designation.	X Routine		B Chairman		<i>T-7-</i>
3	Is this a Construction ((Capital or Expense Funded) or E	R-MSA Project? Y/N	Y Of No skip to Blo	d:4.)	
Varie	Approvals Required Level I (DOE-HQ) Level II (BCCB/P)CCB	Y N X CED/ERD Director	DOI Ry School	E Program Sponsor E Project Manager	RY SAMULLEY 11/10/	7) Date
4	Does This Affect the Co	ontract Line Item (CLIN) Y/N? Scope	(If "No" Skip to Block 5) Schedule	Cost		
		N Y N	× N	Y X		
5	Baseline Impacts				Scope Schedule	Cost
	Cost Account W/P Number	Work Package Title	M&O WP M Name/In	•		
	105 1258					
	AA04	Solar Ponds Project See attached detail cost breakou		F Lockhart	X X X	e page 4-58
		See attached detail Cost Dieastod				
					Total.	0
6	PCCB Disposition.	N () ()	/ ^	-		
PC	CB Chairman.	Dank?	Aunomod Signature		11/22/9	Date
Act	nons Required	A				
7	Contracting Officer			Ext	Date [,]	

ROCK Y FLATS - PLANT CHANGE CONTROL BOARD (PCCB) BASELINE CHANGE PROPOSAL (BCP)

	DADE	LINE CHAINGE	PROPOSAL (I	CI')		
Y New MCS WP- Y/N					BCP No	94-10
8 Description of Change (F Y Y/N - Does this change affect compliance, or the site mission	any of the follow	ing DOE Mileston	es, HQ s agreeme	_		ng, regulation
In June 1993, the DOE, EP final reports in accordance and CDH came to resoluti	with the Roc	ky Flats Interage	ency Agreemer	it In late Se	ptember 1993, D	OE, EPA,
In general, DOE, EPA, and with the OU4 IM/IRA pronow scheduled for Septem approximately 16 months agreed to the following	gram IAG bas ber 1995 The	seline was sched DOE, EPA, and	uled for Janua l CDH have co	ry 1997 The ndensed the	revised constru baseline schedu	iction date is ile by
Incorporate the OU4 Incorporate the OU4 Incorporate the Post- Enhance the IM/IRA Omit the Title I design	Phase II RFI/ Closure Care Conceptual 1	'RI Work Plan in and Monitoring	to the IM/IRA Plan into the l	Decision Do M/IRA Deci	ocument, Ision Document,	,
Although the additional so baseline their program to o				s substantial	and will require	EG&G to re
See attachment pages 5 thr	ough 7 for a c	letailed descript	ion of the chan	ge and CLIN	N #1 milestones	affected P3
				C		
9 Justification of Change						
The old approach prevente the program and potential	•		ation This cha	nge is neces	sary to strategic	ally redirect
and programm potestian	y according to					
10 Impact if not Approved	~					
In the event the proposed l mulestones, which have bee monetary penalties relative	en approved l	y the EPA and (CDH In addit	ion, the DOI	E could be assess	sed IAG
11 Central Planning & Budgets CP&B Representative	J F Pennell	Q & Ben	ell	Ext 6943	Approval Date	11/10/
CP&B Manager	R. H. Piburn	X 1. til		Ext 8011	Approval Date.	11-11-
12. Database Updates EG&G Change Control Coord				Ext	Approval Date	-
EG&G Project Control Office.				Ext	Approval Date	

BCP Form 10/01/93

ROCKY FLATS PLANT - ENVIRONMENTAL RESTORATION PROJECT CONTRACTOR CHANGE CONTROL BOARD (CCCB) Baseline Change Proposal (BCP) Contractor BCP Number Originator (Name & Ext.) Date Instated ERM-010-94 JA Ledford /8673 11/10/93 RFP, OU4' Solar Ponds Project, Cognizanti Mgr (Name & Ext.) Central Planning & Budgeting (Name & Ext.) JEPennell/6943 J.A Ledford /8673 Scope, Schedule, and Cost Female /11-10-93 Re-baselining Concurrence & Date Concurrence & Date Priority Designation Approval Authority Baseline Type Emergency Cost Class 1 Priority Schedule Class 2 Routine Class 3 Technical Change Description See attached PCCB BCP for detailed description 11 Justification for Change The old approach prevented early action for site remediation This change is necessary to strategically redirect the program and potentially 12 Impact of Non-Approval In the event of non-approval, Doe would be required to re-negotiate the In the event of non-approval, Doe would be required to re-negotiate the affected milestones, which have been approved by the EPA and CDH In addition, DOE could be assessed IAB monetary penalties relative to the OUY share I RFI IRI draft and final reports due to mused milestones Scope Sched 13 Baseline Impact Details Cost Impact Impact Impact Cog. Mgr WBS Number Signature WBS Hacklity Investigation RRAF TACKLITY Investigation Interim Measure Decision Phase TI PCRA Facility Investigation Pertamance Mountaining Pre-Construction Consoprial Design The Hiperign 12154 (1,002, 183) 798,56 12173 1,624,54 12185 12175 Contingency (1.845.774) Cost Total Cont. Funded by MR. Authorized Funds CCCB (Class 3) BCP Action Approved Cond. Approved Info Requested Disapproved ER Deputy Project Manager CCCB (Class ___) BCP Action Approved Cond Approved Info Requested Disapproved Endorsed CCCB Chairperson Date P_jCCB (C)ass 1) BCP Action⁴ 16/10/13

PiCCB Chairperson

Approved
Cond Approved
Info Requested
Disapproved
Endorsed

RFP, OU-4; Solar Ponds Projects Scope, Schedule, and Cost Change Proposal (BCP No. 94-10)

Background

The Solar Ponds Projects (SPP) is comprised of four major tasks, 1) pond sludge processing per the Agreement in Principle between the Department of Energy (DOE) and Colorado Department of Health (CDH), 2) water management/treatment per the Interim Measure/Interim Remedial Action Decision Document signed by DOE, Environmental Protection Agency (EPA), and CDH, 3) the Operating Unit 4 (OU-4) assessment and remedial action per the Interagency Agreement (IAG), and 4) pad operations and storage activities which are necessary to met the plant's Resource Conservation and Recovery Act (RCRA) interim status and permit requirements with regard to storage of pond waste material (sludge). The IAG identified the ponds as one of sixteen operable units (OU) to be remediated at Rocky Flats and invoked the 1988 ponds-closure plan. The water management and pond sludge clean-out are necessary precursors to OU-4 assessment and remediation, and pad operations are necessary support activities at least until the sludge is disposed. Each of these major tasks is managed through a Work Package. There are also Work Packages for associated field projects.

The four major tasks were planned as the means to close the ponds and remediate the ponds area. In roughly chronological sequence, the project was scoped to remove water from the ponds, provide a treatment facility to replace the ponds as evaporation, treatment, and storage units for contaminated ground water; remove and dispose of sludge in compliance with all regulations such as the Land Disposal Restrictions of RCRA, assess the nature and extent of contamination at the ponds, complete a RCRA closure of the impoundments, and perform surveillance of the ponds area as needed

Current Status and Accomplishments

EG&G Solar Ponds Projects (SPP) has been reorganized to include all functions under the Environmental Restoration Management charter which has substantially improved the program integrity. The SPP is currently managing a number of Rocky Flats Interagency Agreement (IAG) activities including the following

OU4 Phase I RFI/RI Project
OU4 Phase I IM/IRA Project (includes all design requirements)
OU4 Post Closure Care and Monitoring Project
OU4 Phase II RFI/RI Project

EG&G is currently drilling and sampling within the Solar Evaporation Ponds (SEP), specifically Ponds 207B North and 207B Center in support of the OU4 Phase I RFI/RI Report, scheduled to be submitted to the U S Environmental Protection Agency (EPA) and Colorado Department of Health (CDH) on April 14, 1993 In addition, EG&G is currently developing a Phase I IM/IRA Decision Document which shall include the Phase I RFI/RI Report, Post Closure Assessment Plan and Phase II RFI/RI Work Plan EG&G has identified a variety of technological options for remediating/closing the SEP and will select a preferred alternative by the latter part of November 1993 In addition, EG&G is in the process of preparing the OU4 Phase I RFI/RI Report, which, as stated above, shall be an inclusion within the OU4 IM/IRA Decision Document The OU4 Phase I RFI/RI Report will summarize the Phase I RFI/RI field activities and the data collected

relative to source and soils characterization. The Phase Linvestigation began in November 1992 and was nearly completed by March 1993. Due to the ponds not being emptied of sludge and water, the remaining drilling and sampling was postponed until the ponds were suitable for drilling. Again, the drilling and sampling activity is being conducted at this time

Details For Section 5: "Baseline Impacts"

Impact On Scope

The following table describes the proposed changes in scope on a Work Package-by-Work Package basis

WORK PACKAGE NUMBER	TITLE	CURRENT BASELINE	PROPOSED BASELINE
12159	RCRA Facility Investigation	The scope of this Work Package includes drilling, sampling, data evaluation, baseline risk assessment, horizontal drilling, and report preparation	The revised scope includes the elimination of the baseline risk assessment, horizontal drilling, comment resolution for the Phase I RFI/RI Report, and report modifications
12162	Interim Measure Decision	The scope of this Work Package includes the development of COCs, PRGs, ARARs, technology research and evaluation, selection of a remediation/closure alternative, preparation of the IM/IRA DD and development of the conceptual design	The revised scope includes incorporation of the conceptual design, including the Phase I RFI/RI Report, Post Closure Assessment Plan and Phase II Work Plan into the IM/IRA DD, completing the public comment period for the IM/IRA, and accelerating the schedule, which includes additional milestones and review and comment cycles
12165	Phase II RCRA Facility Investigation	The scope of this Work Package includes the development of a Phase II RFI/RI Work Plan, review and comment cycles, and document revision	The revised scope includes elimination of the review cycles, work plan revision, and development of the final Phase II RFI/RI Work Plan
12173	Performance Monitoring	Not Applicable	The scope of this work package includes technical support relative to the IM/IRA Program, development of a Post Closure Assessment Plan, review and comment of Post Closure Plan and document revision
12180	Pre-Construction	Not Applicable	The scope of this work package will be to provide for qualification of potential bidders for the Title II Remedial Design, development of the Safety Analysis Document and Security Plan, configuration of the IWCP package, and Building 788 oversight

12183	Conceptual Design	Not Applicable	The scope of this work package will be to provide an Enhanced Conceptual Design (ECD) of the selected remedial alternative which includes the post closure care and monitoring scope. The ECD shall provide sufficient detail to allow Title I to be bypassed and development of Title II Design to begin
12185	Title II Design	Not Applicable	The scope of this Work Package will be to provide drawings and fixed price construction specifications for the selected remedial alternative, including the post closure care and monitoring requirements
12175	Contingency	Scope Uncertainties	Scope Uncertainties

All other work packages associated with this ADS are unaffected. Specifically the Work Packages not affected by this BCP are 12150, 12153, 12157, 12169, 12170, 12171, 12174, 12176, 12178, 12179, 12187, and 12188

Details For Section 5: "Baseline Impacts" (continued)

Impact On Funding

The following table describes the proposed changes in funding on a Work Package-by-Work Package basis

WORK PACKAGE NUMBER	TITLE	CURRENT FY94 BASELINE	,	PROPOSED CHANGE	PROPOSED FY94 BASELINE	JUSTIFICATION
12159	RCRA Facility Investigation	\$ 2,341,210	\$	(676,584)	\$ 1,664,626	Program Redirection
12162	Interim Measure Decision	\$ 3,089,734	\$	(1,002,183)	\$ 2,087,551	Program Redirection
12165	Phase II RCRA Facility investigation	\$ 526,513	\$	166,281	\$ 692,794	Program Redirection
12173	Performance Monitoring	\$ 0	\$	798,567	\$ 798,567	Program Redirection
12180	Pre-Construction	\$ 0	\$	433,528	\$ 433,528	Program Redirection
12183	Conceptual Design	\$ 0	\$	501,571	\$ 501,571	Program Redirection
12185	Title II Design	\$ 0	\$	1,624,594	\$ 1,624,594	Program Redirection
12175	Contingency	\$ 1,945,987	\$	(1,845,774)	\$ 100,213	Program Redurection
	TOTAL	\$ 7,903,444	\$	0	\$ 7,903,444	

Funding Sources

The impact to the current FY94 Solar Ponds baseline excluding contingency as a result of this BCP is an increase of \$1,845,774 SPP currently has \$1,945,987 in Contingency Work Package 12175 which will provide adequate funds for the revised baseline. This will decrease Contingency Work Package 12175 to \$100,213

Impact On Schedule

The attached schedule depicts the proposed schedule changes

Programmatic/Other Impacts

The proposed accelerated schedule for the IM/IRA Decision Document, remediation/closure of the Solar Evaporation Ponds (SEP), and re-structuring of the OU4 Phase I Program has eliminated the possibility of the Environmental Protection Agency (EPA) and Colorado Department of Health (CDH) from imposing IAG monetary penalties associated with the missed IAG milestones for the OU4 Phase I draft and final RFI/RI Reports In addition, accelerating the OU4 IM/IRA program by approximately 18 months shall result in substantial cost savings for DOE

Details For Section 8: "Description of Change"

Background Description

In June 1993, the DOE, EPA, and CDH entered into Dispute Resolution for the OU4 Phase I RFI/RI draft and final reports in accordance with the Rocky Flats Interagency Agreement. In late September 1993, DOE, EPA, and CDH came to resolution on all issues associated with OU4 relative to the Dispute Resolution process

In general, DOE, EPA, and CDH agreed to "accelerate" the OU4 IM/IRA program. The construction associated with the OU4 IM/IRA program IAG baseline was scheduled for January 1997. The revised construction date is now scheduled for September 1995. The DOE, EPA, and CDH have condensed the baseline schedule by approximately 16 months. In addition to accelerating the OU4 IM/IRA program, DOE, EPA, and CDH have agreed to the following

Incorporate the OU4 Phase I RFI/RI Report into the IM/IRA Decision Document,

Incorporate the OU4 Phase II RFI/RI Work Plan into the IM/IRA Decision Document,

Incorporate the Post-Closure Care and Monitoring Plan into the IM/IRA Decision Document,

Enhance the IM/IRA Conceptual Design from approximately 25% to 40%, and

Omit the Title I design package

Although the additional scope is minimal, the period of performance is substantially reduced and will require EG&G to re-baseline their program to correspond with the new milestones

Description of Change

The Closure action planned and budgeted for consists of installation of a RCRA cap which would remove the transportation pathway for migration outside the OU4 boundary. The RCRA cap would eliminate the infiltration of precipitation through the soils which allow contaminants to migrate into the groundwater or are carried by precipitation surface flow to other surface soils outside of OU4.

To allow for the installation of a RCRA cap within the OU4 boundary, Building 788 which is located between pond 207C and 207A must be removed. This effort is being planned through D&D.

In an effort to accelerate the closure of the surface impoundments, an Enhanced Conceptual Design (ECD) will be prepared which will allow the Title I Design period to be bypassed and allow Title II design to proceed. The ECD, which will be incorporated into the streamlined IM/IRA decision document, will implement the selected remedial alternative for the pond closure (which has been planned and scheduled assuming a RCRA cap) and include the scope of the post closure care and monitoring requirements for the selected alternative. The Title II design will provide the final drawings and fixed price construction specifications for closure of the selected alternative.

Details For Section 8. "Description of Change" (continued)

To expedite the construction of the selected alternative, procurement of potential construction contractors will begin after the ECD is completed. Interested construction contractors will be solicited through the Commerce Business Daily. All interested parties will then be pre-qualified prior to completion of the Title II Design. After completion of the Title II design, the package will be distributed to the pre-qualified construction contractors for proposals.

The revised streamlined IM/IRA document has been revised to include the following major activities

· Phase I RFI/RI

The RFI/RI will discuss the results of the field investigations conducted at OU4 site to determine the nature and extent of contamination found

• Technology and Alternative Development

After identification of the types of contaminates found at the OU4 site, risk analysis methodology will be utilized to establish which contaminates pose credible risks which must be addressed and which technologies are available which can reduce the risk to 1 X 10-6

• Recommended Remedial Alternative

An Enhanced Conceptual Design will be developed for selected remedial alternative. This information along with the post closure care and monitoring scope will be included in the streamlined IM/IRA document. The Enhanced Conceptual Design will provide sufficient detail to allow the Title I effort to be bypassed and allow for cost and schedule development to ensure the alternative can be implemented within the established milestone agreements

Post Closure Care and Monitoring

After selection of the recommended remedial alternative, the post closure care and monitoring requirements can be identified. This will include instrumentation and equipment required to ensure the alternative is performing as designed and maintenance required to ensure the integrity of the alternative is not compromised

• Title II Design

The Title II design of the recommended remedial alternative will develop the Enhanced Conceptual Design effort into final drawings and fixed price construction specifications. The effort will also incorporate the post closure care and monitor equipment installation requirements.

• Phase II Work Plan

The OU4 Phase II RFI/RI Work Plan is an IAG requirement, which shall be designed to characterize the alluvial and bedrock ground water systems

Details For Section 8: "Description of Change" (continued)

DOE Milestones Affected by the Changes

ACCOUNT	OU-4 SOLAR	ACTIVITY	DESCRIPTION	CURRENT	REVISED
NUMBER	PONDS	NUMBER		DATE	DATE
AA04	OU-4 Solar Ponds	CDMR	Complete DOE Mid Year Review on Work Packages(12159 12162 12165) - External	03/23/94	03/23/94

WORK PACKAGE NUMBER	OU-4 SOLAR PONDS	ACTIVITY NUMBER	DESCRIPTION	CURRENT DATE	REVISED DATE
12159	RCRA Facility Investigation	01010	Draft Contam of Concern Tech Memo - External	10/7/93	OBE*
12159	RCRA Facility Investigation	02010	Draft Toxicity Assessment Tech Memo - External	10/7/93	OBE*
12159	RCRA Facility Investigation	01020	Final Contam of Concern Tech Memo - External	1/10/94	OBE*
12159	RCRA Facility Investigation	02020	Final Toxicity Assessment Tech Memo External	1/10/94	OBE+
12159	RCRA Facility Investigation	04010	Draft Phase I RFI/RI Report - External	4/15/94	OBE*
12159	RCRA Facility Investigation	04020**	Final Phase I RFI/RI Report - External	9/16/94	OBE*
12162	Interim Measure Decision	00061**	Provide DOE & EPA/CDH Draft Copy IM/Transmittal Round Table Review - External	4/13/94	2/25/94
12162	Interim Measure Decision	00071**	Submit Phase I Proposed IM/IRA DD - External	9/8/94	OBE*
12165	Phase II RCRA Facility Investigation	0060	Submit Draft Phase Il RFI/RI Work Plan to DOE - External	3/1/94	OBE*
12165	Phase II RCRA Facility Investigation	0100**	Submit Draft Phase II RFI/RI Work Plan to EPA and CDH - External	4/22/94	OBE*
12165	Phase II RCRA Facility Investigation	0140	Submit Final Phase II RFI/RI Work Plan to DOE - External	7/28/94	OBE*
12165	Phase II RCRA Facility Investigation	01080**	Submit Final Phase II RFI/RI Work Plan to EPA/CDH - External	9/19/94	OBE•
12162	Interim Measure Decision	32119	Transmittal (Phase I Draft Review) IAG #1 - External	NA	4/14/94
12162	Interim Measure Decision	32121	Transmittal (Phase I Review) IAG #2 - External	NA	6/24/94
12162	Interim Measure Decision	32123	Transmittal (Draft Resp Summary Review) IAG #3 - External	NA	11/1/94
12162	Interim Measure Decision	32125	Transmittal (Final DD & Resp Summary Review) IAG #4 - External	NA	1/13/95
12185	Title II Design	32238	Transmittal (Implementation Document) IAG #5 - External	NA	2/10/95
12185	Title II Design	25009	60% Transmittal (Title II) - External	NA	7/8/94
12185	Title II Design	35009	90% Transmittal (Title II) - External	NA	10/5/94
12180	Pre-Construction	32417	Start Construction IAG #6 - External	NA	9/27/95

Details For Section 9: "Justification of Change"

OBE Overcome-by Events
Block 4 - CLIN Level Impacted Milestones

Details For Section 9: "Justification of Change"

The old approach prevented early action for site remediation. This change is necessary to strategically redirect the program and accelerate site remediation.

Details For Section 10: "Impact if not Approved"

In the event the proposed baseline is not authorized, the DOE would be required to re-negotiate the affected milestones, which have been approved by the EPA and CDH. In addition, the DOE could be assessed IAG monetary penalties relative to the OU4 Phase I RFI/RI draft and final reports due to missed milestones.